Public Consultation Submissions Report

FLOOD RISK MANAGEMENT
CLIMATE CHANGE SECTORAL ADAPTATION PLAN

(2019-2024)
TABLE OF CONTENTS

Overview 1

APPENDICES

APPENDIX A – CONSULTATION GUIDELINES NOTES
Overview

The statutory Climate Change Sectoral Adaptation Plan for Flood Risk Management is prepared under the Climate Action and Low Carbon Development Act, 2015 and the National Adaptation Framework, 2018. The Framework sets out the national strategy to reduce Ireland’s vulnerability to the negative effects of climate change and to avail of any positive impacts.

The overarching goal of this Plan is ‘Promoting sustainable communities and supporting our environment through the effective management of the potential impacts of climate change on flooding and flood risk’, which is underpinned by 3 objectives and a number of specific actions.

The draft plan was published on the 19th July 2019 for the purpose of public consultation for a period of four (4) calendar weeks, with the consultation advertised in the Irish Times, Irish Independent and Irish Examiner. The deadline for receipt of submissions was the 16th August 2019. Appendix A provides Consultation Guideline Notes that were available for making a submission.

A total of twenty-eight (28) submissions were received in response to the public consultation from a range of bodies including state bodies; academia; industry interest groups; private individuals and others. A breakdown of the source of the submissions is set out in Table 1 below.

Table 1 – Breakdown of the source of submission

<table>
<thead>
<tr>
<th>Source</th>
<th>% of Observations</th>
</tr>
</thead>
<tbody>
<tr>
<td>State Agency</td>
<td>39%</td>
</tr>
<tr>
<td>Members of the Public</td>
<td>25%</td>
</tr>
<tr>
<td>Associations / Non-governmental organisations</td>
<td>14%</td>
</tr>
<tr>
<td>Local Authorities / Councils</td>
<td>18%</td>
</tr>
<tr>
<td>Academia</td>
<td>4%</td>
</tr>
</tbody>
</table>

A summary of the issues frequently raised within the submissions, and responses to these, is provided in Table 2 overleaf.

All submissions were comprehensively reviewed with careful consideration given to the issues raised.

The OPW wishes to thank those who took the time to respond to the call for comments on the statutory Climate Change Adaptation Plan for Flood Risk Management. All contributions will help to inform and enhance the flood risk management adaptation policy.
Table 2 – Summary of issues frequently raised and responses

<table>
<thead>
<tr>
<th>Summary of Issue Raised</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Importance of a whole of government response and collaboration across sectors to address climate change impacts.</td>
<td>The Plan recognises that addressing the impacts of climate change on flooding and flood risk management is very much a cross sectoral issue. Section 2 of the Plan details the establishment of a number of cross sectoral groups, while Objective 3 (Section 6.2) specifically emphasises the importance of the ‘whole-of-Government’ approach to flood risk management, including climate adaptation. Further information is provided in Appendix C on the structures that are in place to support this collaboration and Appendix F outlines potential cross-sectoral climate impacts.</td>
</tr>
<tr>
<td>Interest in capacity building in relation to impacts of climate change on flood risk and possible adaptation opportunities.</td>
<td>The OPW recognises the importance of capacity building. Action 1.1 provides for appropriate training in relation to climate change and flood risk, while other Actions under Objective 1 are aimed at enhancing the understanding with the OPW and across sectors and the local authorities of the potential impacts of climate change.</td>
</tr>
<tr>
<td>Emphasis of the importance of working with nature, the consideration of water quality and biodiversity and of natural flood management as part of the adaptation response to climate impacts.</td>
<td>The OPW is currently engaging with other stakeholders and supporting pilot and research projects to explore softer forms of managing flood risk, such as through natural water retention measures and an integrated approach to catchment management. The Plan also includes an action concerning the promotion of natural water retention measures (Action 3.B).</td>
</tr>
<tr>
<td>Concerns in relation to planning and planning guidelines.</td>
<td>The importance of the consideration of flood risk, both current and future, in planning and development management is critical for sustainable development and the management of flood risk over the long-term. The consideration of the potential impacts of climate change in planning and development management is identified as a matter of very high priority within the Plan and a specific action assigned (Action 3.A).</td>
</tr>
<tr>
<td>Concerns associated with a specific flood relief scheme and associated local issues.</td>
<td>The Sectoral Adaptation Plan is focused on adaptation to the potential impacts of climate change on flooding and flood risk management. The determination of flood relief scheme options / proposals for specific communities is beyond the scope of the Sectoral Adaptation Plan.</td>
</tr>
<tr>
<td>Summary of Issue Raised</td>
<td>Response</td>
</tr>
<tr>
<td>----------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Concerns in relation to the causes of, and mitigation measures for, climate change.</td>
<td>The Climate Change Adaptation Plan focuses on adaptation rather than mitigation, and it is beyond the scope of the Plan to identify the causes of climate change or to set mitigation requirements.</td>
</tr>
<tr>
<td>Concerns in relation to climate predictions and the science of climate change.</td>
<td>The OPW recognises the uncertainty over the degree of potential changes arising from climate change, and adaptation within the flood risk management sector needs to cater for the range of potential change, notwithstanding the cause of that change. Objective 1 (section 6.2) within the Plan, and the Actions identified under this Objective, are aimed at enhancing our understanding of potential climate change impacts on flood-related parameters and the potential full range of impacts in terms of flooding and flood risk.</td>
</tr>
<tr>
<td>Concerns in relation to coastal erosion.</td>
<td>The Sectoral Adaptation Plan is focused on adaptation to the potential impacts of climate change on flooding and flood risk management. While the risk of erosion to coastline is noted and a matter of concern, it is not within the scope of the Plan.</td>
</tr>
<tr>
<td>Proposals for the provision of further information or greater detail on particular topics / sections within the Plan.</td>
<td>The Plan was developed with a public audience in mind, as well as a more technical audience, and a balance was sought to outline the relevant issues, work done and the actions required in reasonable detail while preserving the public accessibility to the content. Further detail on particular topics can be provided directly to specific audiences as required.</td>
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</table>
Appendix A

Consultation Guidance Notes
Public Consultation on the Draft Climate Change Sectoral Adaptation Plan for Flood Risk Management

Consultation Guidance Notes

The OPW welcomes all views and comments on the draft Sectoral Adaptation Plan which will help inform the planned actions we take to adapt our flood risk management policies and activities to minimise the potential impact of climate change.

1. Your Contact Details
   Full Name:
   Organisation:
   Town & Country:
   Email:

2. Does the Draft Climate Change Sectoral Adaptation Plan adequately demonstrate the potential impact climate change may have on Flood Risk Management in Ireland (see Section 3 of Draft Plan)?
   □ Yes
   □ No
   □ Unsure

3. Do the case studies in the draft Plan satisfactorily demonstrate the key impacts of climate change through a representative selection of assessments of flood risk in Ireland (see Section 5.2)?
   □ Yes
   □ No
   □ Unsure

4. Are the Adaptation Objectives appropriate for the 5-year duration of this plan (see Section 6.2)?
   □ Yes
   □ No
   □ Unsure

5. A series of specific Actions have been defined under each Adaptation Objective. Do you agree with these Actions (see section Table 6-1)?
   □ Yes
   □ No
   □ Unsure
6. Which Actions are the most important to concentrate on during the first 5 years of this Sectoral Plan?

Please Explain:

7. What might you or your organisation do to assist the implementation of this Sectoral Plan (see section 7)?

Please Explain:

8. Any other comments?

9. The OPW would like your permission to publish your consultation response. Please indicate your publishing preference (select one):

☐ Publish my response with my name
☐ Publish my response without my name
☐ Do not publish my response

10. Please indicate whether you consent to your submission being shared by the OPW with other relevant Government Departments and stakeholders:

☐ Yes
☐ No